



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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October 19, 2009

Mr. Tom Currin
SEIS Project Manager
Naval Facilities Engineering Command Southeast
Box 30, Building 903
NAS Jacksonville
Jacksonville, Florida 32212-0030

SUBJECT: Draft Supplemental Environmental Impact Statement for the Navy's Renewal of Authorization to Use Pinecastle Range in the Ocala National Forest, Florida; CEQ Number 20090308

Dear Mr. Currin:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Draft Supplemental Environmental Impact Statement (EIS) in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The U.S. Department of the Navy (Navy) prepared a Draft Supplemental EIS to update the impact analysis contained in the 2002 Final EIS for the Renewal of Authorization to Use Pinecastle Range in the Ocala National Forest, Florida.

The Draft Supplemental EIS analyzes information that was not available at the time the 2002 Final EIS was completed and since the Record of Decision was signed in March 2002. For example, the 2002 Final EIS used HAZARD modeling software to determine appropriate exclusion or safety zones, including Range Safety Zone A, now referred to as Range Compatibility Zone I (RCZ-I). Following completion of the Final EIS, new modeling software (SAFE-RANGE) was developed. By using this more technologically advanced modeling software, the exclusion zones increased in size over the exclusion zones in the 2002 Final EIS. The Draft Supplemental EIS analyzes the environmental consequences resulting from the expanded exclusion zones and assesses the effectiveness of existing mitigation measures at Pinecastle Range. Other than these changes, there would be no changes to target areas, ordnance delivery method, the number of flights, or the volume of munitions used at Pinecastle Range for military training.

EPA provided comments on the original EIS for the renewal of the special use permit with the U.S. Forest Service to use Pinecastle Range for continued bombing activities and the potential environmental impacts of these activities. EPA commends the Navy for conducting additional compatible use zone modeling and for completing a Supplemental EIS to address the impacts of the newly identified safety zones. The use of this updated modeling resulted in an additional 629 acres for unit level training activities and 11,365 acres for major training exercises in RCZ-1 that was not analyzed in the 2002 Final EIS. Based on a review of the Draft

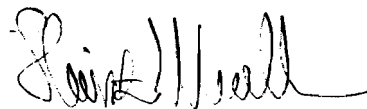
Supplemental EIS, it appears that none of the expanded safety zones would extend beyond the boundaries of the Ocala National Forest, and the majority of these zones occur in lightly utilized sand pine habitat. These zones are not anticipated to encumber any campgrounds or areas where large numbers of people gather. However, the proposed action is anticipated to have the potential for negative impacts on the Florida National Scenic Trail (FNST).

Related to the existing and proposed mitigation measures, part of the purpose and need described in this document was to "assess the effectiveness of existing mitigation measures at Pinecastle Range." Unfortunately, there is very little discussion of the effectiveness of the implementation of the existing mitigation measures in the Draft Supplemental EIS. The risk management analysis included in Chapter 4 of the EIS identified the importance of existing and proposed mitigation measures. However there is no evidence included on how the current mitigation measures are working to reduce or minimize the overall impacts of training activities on specific recreational activities and other natural resources. EPA recommends that the Final Supplemental EIS include more information to substantiate the reduction in risk after implementation of these measures. In general, EPA supports the current and proposed mitigation measures described in Chapter 6 to further minimize this risk. EPA recommends that the Navy consult with the U.S. Forest Service and Florida Trail Association to further refine any mitigation measures related to the FNST. Although, not listed as an individual mitigation measure, EPA also strongly recommends that the Navy continue its annual groundwater monitoring program to ensure that public health and safety are maintained.

The Draft Supplemental EIS suggests that the increase in size of RCZ-1 areas would not result in any change to the noise environment from the 2002 Final EIS. EPA agrees with this conclusion based on the information included in the Supplemental Draft EIS. However, is there any reasonably foreseeable or predicted use of the Pinecastle Range by the new F-35 Joint Strike Fighter or the proposed east coast basing of this aircraft? The noise signature of this aircraft is significantly greater than existing aircraft currently using the Pinecastle Range. EPA recommends that the Final Supplemental EIS include a discussion of this aircraft and the extent to which it will be using the Pinecastle Range, if at all. If the F-35 will be using Pinecastle, EPA recommends that the Navy include updated noise modeling in the Final Supplemental EIS to address these potential impacts.

Based on full implementation of the existing and proposed mitigation measures identified in the Draft Supplemental EIS, EPA has no objections to the proposed action. We appreciate the opportunity to review the proposed action. Please contact Ben West of my staff at (404) 562-9643 if you have any questions or want to discuss our comments further.

Sincerely,

A handwritten signature in black ink, appearing to read "Heinz J. Mueller", written in a cursive style.

Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management